UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

In the Matter of an Arbitration Between: CIVIL ACTION NO. 04 12646 NG PT SUMOHADIWIDJOJO, ASSENTED-TO MOTION FOR LEAVE TO Applicant and FILE A BRIEF EXCEEDING 20 PAGES IN Counterclaim Defendant LENGTH IN OPPOSITION TO (Respondent below) APPLICANT'S MOTION TO STRIKE OR and DISMISS, OR TO STAY, RESPONDENT'S COUNTERCLAIM BSB RESIDUAL ASSETS TRUST, BSB TRUST COMPANY, LTD., Trustee, Respondent and Counterclaim Plaintiff (Claimant below). CITIZENS BANK Trustee

Respondent BSB Residual Assets Trust and BSB Trust Company, Ltd., Trustee (together "BSB") hereby moves, pursuant to Local Rule 7.1(B)(4), for leave to file an opposition memorandum of 26 pages in length to the motion to strike, dismiss, or stay BSB's counterclaim filed by Applicant PT Sumohadiwidjojo ("PTSW").

As grounds for this motion, BSB states that the additional page length is required to address the arguments raised in PTSW's 24-page memorandum in support of its motion.

Undersigned counsel certifies pursuant to Local Rule 7.1(A)(2) that counsel for BSB has conferred with counsel for PTSW on the matter set forth in this motion and that PTSW has assented to this motion.

Respectfully submitted,

BSB RESIDUAL ASSETS TRUST AND BSB TRUST COMPANY, LTD., TRUSTEE, Respondent and Counterclaim Plaintiff

By its attorneys,

/s/ Mark C. Fleming _

Richard A. Johnston (BBO # 253420) Mark C. Fleming (BBO # 639358) WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 (617) 526-6000 richard.johnston@wilmerhale.com mark.fleming@wilmerhale.com

Dated: June 16, 2005